

IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE RICHARD M. OSBORNE, SR.

Debtor

CASE NO. 17-17361

JUDGE ARTHUR I. HARRIS

CHAPTER 11

FILED
2018 NOV -2 PM 1:24
U.S. BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

**MOTION OF RICHARD M. OSBORNE, SR., DEBTOR IN POSSESSION TO EMPLOY WILLIAM T.
WULIGER, ESQ. AS SPECIAL COUNSEL**

Richard M. Osborne, Sr., debtor in possession, ("Debtor"), moves this Court for an order authorizing him to employ special counsel.

Necessity for Employment. The Debtor has determined that the administration of assets of the estate and the resolution of claims of creditors require the Debtor to perform or obtain specialized legal services. The Debtor needs to retain special counsel in order to advise him with regard to a certain litigation matters. Such matters require the expertise of legal counsel with particular expertise in business litigation, law and trial experience. These matters are described below.

THE COURT WILL HEAR ARGUMENT ON THE APPLICATION TO EMPLOY SPECIAL COUNSEL AND THE OBJECTION BY FIRST NATIONAL BANK OF PENNSYLVANIA AT 11:00 AM ON NOV. 20, 2018.

